

**Filed via ECFS**

March 4, 2016

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554  
Attn: Wireline Competition Bureau

Re: Connect America Fund, WC Docket No. 10-90

Dear Ms. Dortch,

Adams Telephone Co-Operative ("Adams"), Study Area Code 340976, hereby notifies the Federal Communications Commission ("FCC" or "Commission") and the Wireline Competition Bureau ("WCB" or "Bureau") of changes that the Company made to its previous two FCC Form 477s on March 2<sup>nd</sup> and 3<sup>rd</sup>, 2016 and requests that these most recent changes be incorporated into the forthcoming versions of the Alternative Connect America Model ("A-CAM").

Adams' originally-filed FCC Form 477s containing data as of December 31, 2014, and June 30, 2015 had incorrectly identified 94 census blocks that were previously reported as served by fiber to the home, but are only able to be served by copper DSL service. The mislabeled blocks were an inadvertent error that came to light when we began reviewing the A-CAM Version 4.2 illustrative results in depth. We then filed revisions to our 477 filings on February 19, 2016 and advised the FCC of this revision in a letter filed on the ECFS filing system.

However, on March 2, we were informed by our consultant that in an email to them, FCC staff that handle Form 477 reporting clarified that the requirement to report the maximum "advertised" speeds for broadband deployment means the "Point of Sale where the potential customer learns what the true max-speeds are for his/her location" and that "the filer should use the accurate information about speed that is conveyed at the Point of Sale." Our consultants relayed that FCC staff explained, "Another way of looking at this is that the service provider is advertising only partial information at its most general level of advertising—and that the full level of advertising is at the Point of Sale."

Given this clarification, we realized that when we made our revision on February 19, we had misunderstood the directions on how the speeds used should be reported so we had not corrected the speed classification for many of our DSL customers on our copper plant and what we reported as the speeds for census blocks being served by our copper plant. Instead, we were under the impression we should use the highest speeds advertised for the DSL service, which we advertise as an "up to speed". Therefore, we have now filed revisions to our FCC Form 477s containing data as of June 30, 2015 and December 31<sup>st</sup>, 2015 to accurately reflect the maximum broadband speeds those DSL customers can actually receive.

Although Adams immediately has taken action and submitted revised forms on March 2, 2016 and March 3, 2016, the Company remains concerned that these changes will not be incorporated into the forthcoming versions of the A-CAM. Adams respectfully requests that the FCC allow these corrections to be included in the A-CAM as soon as possible to reflect accurately these facts. Without these corrections, future versions of the A-CAM will not reflect the facts pertaining to the Census Blocks served by Adams Telephone Co-Operative with the correct broadband technology and speeds that can be achieved on the DSL technology. Without these corrections, the Commission's universal service policy for Adams' study area will be frustrated as the amount of support available will not be sufficient to advance broadband technology in the area.

Please let us know if you have any further questions in this matter.

Sincerely,

ADAMS TELEPHONE CO-OPERATIVE

A handwritten signature in cursive script that reads "Robert L. Hutter".

Robert L. Hutter  
Chief Financial Officer